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VIA ECF

MEMO ENDORSED

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Joseph Bailey
19 Cr. 412 (CM)

JK
Colleen McMahon
10/17/2022

Dear Judge McMahon:

We represent the defendant, Joseph Bailey, in the above-referenced matter. We are writing to request the Court's permission for Mr. Bailey to travel to Israel between November 16 and December 2, 2022. We are advised by Assistant United States Attorney Dina McLeod that the government has no objection to this request.

Mr. Bailey pleaded guilty to one count of violating 18 USC 1349 (conspiracy to commit wire fraud) on January 15, 2020. Mr. Bailey was sentenced by the Court on December 22, 2020 to a term of imprisonment of six months, followed by a term of supervised release of three years. Mr. Bailey surrendered to the custody of the Bureau of Prisons ("BOP") on October 7, 2021 to serve his sentence. Mr. Bailey has since been released from BOP custody and is on supervised release. Mr. Bailey has complied with all of the terms of his supervised release. In addition, Mr. Bailey has fully satisfied the restitution and forfeiture obligations arising from this case. Finally, during the period of his pre-trial release Mr. Bailey complied with all terms imposed by pre-trial services.

Mr. Bailey seeks permission to travel to Israel between November 16 and December 2, 2022 to celebrate his grandson's Bar-Mitzvah. Mr. Bailey will be accompanied on the trip by his wife and children.

We respectfully request that the Court allow the requested travel.

Respectfully,



Michael Sardar

cc: AUSA Dina McLeod (by ECF)
Probation Officer Kristen K. Maharaj (Kristen_maharaj@nyep.uscourts.gov)